

Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

AIR QUALITY PERMIT

Permittee Name: DESA International Incorporated
Mailing Address: 2701 Industrial Drive, Bowling Green, Kentucky 42102

Source Name: Same
Mailing Address: Same

Source Location: 2701 Industrial Drive

Permit Type: Federally-Enforceable
Review Type: Title V

Permit Number: V-99-013 (Revision 1)
Log Number: F456, G496

Application
Complete Date: January 15, 1998 (F456), April 3, 2000 (G496)

KYEIS ID #: 105-3960-0057
AFS Plant ID #: 21-227-00057
SIC Code: 3433

Region: South Central
County: Warren

Issuance Date: August 5, 1999
Revision Date:
Expiration Date: August 5, 2004

John E. Hornback, Director
Division for Air Quality

TABLE OF CONTENTS

<u>SECTION</u>		<u>DATE OF ISSUANCE</u>	<u>PAGE</u>
SECTION A	PERMIT AUTHORIZATION		1
SECTION B	EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS		2
SECTION C	INSIGNIFICANT ACTIVITIES	August 5, 1999	5
SECTION D	SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS		6
SECTION E	SOURCE CONTROL EQUIPMENT OPERATING REQUIREMENTS	August 5, 1999	7
SECTION F	MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS	August 5, 1999	8
SECTION G	GENERAL CONDITIONS		11
SECTION H	ALTERNATE OPERATING SCENARIOS		16
SECTION I	COMPLIANCE SCHEDULE		17

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application which was determined to be complete on April 3, 2000, the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the Regulation 401 KAR 50:035, Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

08 (8a/8b) 2 Spray booths having a maximum spraying rate of 10.4 gallons / hour each
Control equipment : Dry filter media for 8a, water wall for 8b
Construction Commenced: September, 1979

APPLICABLE REGULATIONS:

401 KAR 59:010, New process operations

401 KAR 63:021, Existing sources emitting toxic air pollutants

401 KAR 63:060, List of hazardous air pollutants, petitions process, lesser quantity designations, and source categories

1. Operating Limitations:

None

2. Emission Limitations:

Visible emissions shall not equal or exceed 20% opacity. The opacity shall be determined by Reference Method 9 of Appendix A to 40 CFR 60, filed by reference in 401 KAR 59:010.

Particulate emissions shall not exceed the PM emission rate limit calculated by the following formula.

$$E = 3.59 P^{0.62}$$

Where P is the process weight (total weight of all materials introduced into each emission unit which may cause the emissions of particulate matter) in tons/hour. If the process weight equals or is less than 0.5 ton/hour, then the particulate matter emission rate shall not exceed 2.34 lbs./hr.

Volatile organic compounds shall not exceed 238 tons per 12 month rolling average (self-imposed to preclude applicability of 401 KAR 51:017).

Compliance Demonstration

To provide reasonable assurance that the particulate matter emission limitations (TSP and PM₁₀) are being met, the permittee shall monitor the amount and type of process weight added to each particulate matter emissions unit. The process weight shall be determined as the average hourly tons added to the emission unit averaged over a one-month period. Average particulate emissions shall be calculated as follows:

Particulate emissions = (Monthly production rate) x (KYEIS emission factor)/(Hours of operation per month). This emission factor may be replaced a number obtained by the latest test approved by the Division.

To provide assurance that the VOC emission limitation is being met, the permittee shall monitor the amount and type of paint used and the VOC content of that paint. The VOC emissions shall be determined using the following equation:

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (continued)

$$\text{Monthly VOC emissions} = \sum_{n=1}^N [\text{Total amount of paint 'n' used (in lbs of paint 'n' used/month)} * \text{VOC content of paint 'n' (in lbs VOC/lb paint 'n' used)}] / 2000 \text{ (lbs/ton)}$$

Where: N = the total number of paints used at these emission points during the month.
The VOC contents of the paints used at these emission points shall be verified by maintaining the MSDS sheets.

The percentages of VOC listed on the MSDS sheets shall be used in calculating the actual emissions, unless alternate values have been pre-approved by the Division.

3. Testing Requirements:

Not Applicable

4. Specific Monitoring Requirements:

Opacity readings shall be performed by a certified visible emissions observer at least once per quarter during paint spraying operations as per Method 9. If a certified visible emissions observer is not available, qualitative observations of the visible emissions shall be made and a log of the observations shall be maintained. If visible emissions from the stack are perceived or believed to exceed the applicable standard, the permittee shall determine the opacity of emissions by Reference Method 9, initiate an inspection of the control equipment, and make any necessary repairs. The calculated monthly VOC emission rate shall be monitored to ensure that the permittee does not exceed the specified limit.

5. Specific Recordkeeping Requirements:

Records shall be maintained of the Method 9 opacity readings, the qualitative reading of visible emissions, and any corrective measures taken. Records shall also be maintained of the monthly usage rates and MSDS of each of the paints. Records shall be maintained of the calculated total monthly and 12 month rolling average VOC emissions from the plant.

6. Specific Reporting Requirements:

Any exceedance of the opacity, particulate, or VOC emission limits as stated in this permit shall be reported to the Division within 3 days of the exceedance. Following an exceedance the company shall continue to submit the monthly visible emission readings for 12 months.

All pollutant emissions regulated in this permit that are in excess of the emission limits specified in this permit shall be reported to the Division promptly per General Condition Section F 6 (b) of this permit.

7. Specific Control Equipment Operating Conditions:

None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (continued)

- 14(16)** 7 kW generator assembly line.
Control equipment: None
Construction Commenced: April 3, 2000
- 15(17)** 10 kW generator assembly line.
Control equipment: None
Construction Commenced: April 3, 2000

APPLICABLE REGULATIONS:

No applicable regulations.

- 1. Operating Limitations:**
None
- 2. Emission Limitations:**
None
- 3. Testing Requirements:**
Not Applicable
- 4. Specific Monitoring Requirements:**
None
- 5. Specific Recordkeeping Requirements:**
None
- 6. Specific Reporting Requirements:**
None
- 7. Specific Control Equipment Operating Conditions:**
None

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to Regulation 401 KAR 50:035, Section 5(4).

	<u>Description</u>	<u>Generally Applicable Regulation</u>
1.	Paint hook cleaning oven	59:010
2.	2,000 gallon kerosene and #2 fuel oil storage tank	None
3.	2,000 gallon xylene storage tank	None
4.	1,000 gallon kerosene and #2 fuel oil storage tank	None
5.	Detrex Washer 2.5 mmBTU/hr natural gas fired washer	61:015
6.	First Stage heater for three-stage washer 3.2 mmBTU/hr natural gas fired heater	61:015
7.	Second Stage heater for three-stage washer 1.3 mmBTU/hr natural gas fired washer	61:015
8.	Drying Oven 2.5 mmBTU/hr natural gas fired oven	None
9.	Bake Oven 2.5 mmBTU/hr natural gas fired oven	None

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. Plant wide VOC emissions shall not exceed 245 tons per 12 month rolling average. These emissions shall be calculated using the following equation:

$$VOC_{plant} = VOC_{monthly} * 12 + 7$$

Where 7 is the tons per year VOC emissions from sources other than emission point 8 and VOCmonthly are the monthly emissions from emission point 8.

2. Compliance with annual emissions and processing limitations imposed pursuant to 401 KAR 50:035, Section 7(1)(a), and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:012, Section 1(1), and 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the cabinet which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
 - a. Date, place as defined in this permit, and time of sampling or measurements.
 - b. Analyses performance dates;
 - c. Company or entity that performed analyses;
 - d. Analytical techniques or methods used;
 - e. Analyses results; and
 - f. Operating conditions during time of sampling or measurement;
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 50:035, Permits, Section 7(1)(d)2 and 401 KAR 50:035, Permits, Section 7(2)(c)].
3. In accordance with the requirements of Regulation 401 KAR 50:035, Permits, Section 7(2)(c) the permittee shall allow the Cabinet or authorized representatives to perform the following:
 - a. Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;
 - b. Have access to and copy, at reasonable times, any records required by the permit:
 - i. During normal office hours, and
 - ii. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency; and
 - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

5. Summary reports of any monitoring required by this permit shall be submitted to the Division's Bowling Green Regional Office at least every six (6) months during the life of this permit, unless otherwise stated in this permit. The reports are due within 30 days after the end of each six month reporting period which commences on the initial issuance date of this permit. The permittee may shift to semi-annual reporting on a calendar year basis upon approval of the regional office. If calendar year reporting is approved, the semi-annual reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to Section 6(1) of Regulation 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.
6.
 - a. In accordance with the provisions of Regulation 401 KAR 50:055, Section 1 the owner or operator shall notify the Division for Air Quality's Bowling Green Regional Office concerning startups, shutdowns, or malfunctions as follows:
 1. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 2. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
 - b. In accordance with the provisions of Regulation 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by general condition 6 a. above) to the Division for Air Quality's Bowling Green Regional Office. Prompt reporting is defined as follows:
 - i. For emission related deviations from the permit conditions, the permittee shall include a summary of the exceedances within three days.
 - ii. For other deviations from permit conditions, the permittee shall submit an exceedance summary with the semiannual report.

For other requirements:

In the event that the permittee is unable to fulfill a requirement (such as a performance test, compliance certification submittal) within the time frame specified herein, the permittee shall contact the Bowling Green Regional Office and the Frankfort Central Office within 72 hours of expiration of the relevant time frame. Extensions of the time frames specified herein may be granted by the division upon a satisfactory request showing that an extension is justified.
7. Pursuant to Regulation 401 KAR 50:035, Permits, Section 7(2)(b), the permittee shall annually complete and return a Compliance Certification Form (DEP 7007CC) to the Division's London Regional Office in accordance with the following requirements:
 - a. Identification of each term or condition of the permit that is the basis of the certification;

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

- b. The compliance status regarding each term or condition of the permit;
- c. Whether compliance was continuous or intermittent; and
- d. The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).
- e. The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date, or by January 30th of each year if calendar year reporting is approved by the regional office. Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality	U.S. EPA Region IV
1508 Westen Avenue	Atlanta Federal Center
Bowling Green Regional Office	Air Enforcement Branch
Bowling Green, KY 42104	61 Forsyth St.
	Atlanta, GA 30303-8960

Division for Air Quality
File Room
803 Schenkel Lane
Frankfort, KY 40601

- 8. In accordance with Regulation 401 KAR 50:035, Section 23, the permittee shall provide the division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee.
- 9. Pursuant to Section VII.3 of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the division by the source or its representative within forty-five days after the completion of the fieldwork.

SECTION G - GENERAL CONDITIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be (a) violation(s) of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) and for federally enforceable permits is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition.
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause. The permit will be reopened for cause and revised accordingly under the following circumstances:
 - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to Regulation 401 KAR 50:035, Section 12(2)(c);
 - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
 - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish to the division, in writing, information that the division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. [401 KAR 50:035, Permits, Section 7(2)(b)3e and 401 KAR 50:035, Permits, Section 7(3)(j)]
5. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [401 KAR 50:035, Permits, Section 7(3)(k)]

SECTION G - GENERAL CONDITIONS (CONTINUED)

6. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [401 KAR 50:035, Permits, Section 7(3)(e)]
7. Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.
8. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6). [401 KAR 50:035, Permits, Section 7(3)(h)]
9. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 50:035, Permits, Section 8(3)(b)]
10. This permit shall not convey property rights or exclusive privileges. [401 KAR 50:035, Permits, Section 7 (3)(g)]
11. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.
12. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 50:035 , Permits, Section 7(2)(b)5]
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 50:035, Permits, Section 8(3)(a)]
14. Permit Shield: Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit. [401 KAR 50:035, Permits, Section 12]
2. All previously issued construction and operating permits are hereby subsumed into this permit.

SECTION G - GENERAL CONDITIONS (CONTINUED)

(b) Permit Expiration and Reapplication Requirements

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and

conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the division [401 KAR 50:035, Permits, Section 12].

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of Regulation 401 KAR 50:035, Section 15.
2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

(e) Acid Rain Program Requirements

If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
 - i) An emergency occurred and the permittee can identify the cause of the emergency;
 - ii) The permitted facility was at the time being properly operated;
 - iii) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit;and,

SECTION G - GENERAL CONDITIONS (CONTINUED)

1. iv)The permittee notified the division as promptly as possible and submitted written notice of the emergency to the division within two working days after the time when mission limitations were exceeded due to the emergency. The notice shall meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. This requirement does not relieve the source of any other local, state or federal notification requirements.
2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement.
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:
RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346
2. If requested, submit additional relevant information by the division or the U.S. EPA.

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
 - e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

SECTION G - GENERAL CONDITIONS (CONTINUED)

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H - ALTERNATE OPERATING SCENARIOS

Not Applicable

SECTION I - COMPLIANCE SCHEDULE

Not applicable